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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

16 LOS ANGELES PRESS CLUB,
17 STATUS COUP,

18 PLAINTIFFS,

19 v.

20 CITY OF LOS ANGELES, a municipal
21 entity, JIM MCDONNELL, LAPD
22 CHIEF, sued in his official capacity;

23 DEFENDANTS.

24 Case No. 2:25-CV-05423-HDV-E

25 Hon. Hernan D. Vera

26 **DECLARATION OF HECTOR
27 ADOLFO QUINTANAR PÉREZ**

1 Declaration of Héctor Adolfo Quintanar Perez
2

3 I, Héctor Adolfo Quintanar Perez, hereby declare as follows:

4 1. My first language is Spanish. I am fluent in English however this
5 statement has been edited for fluency. My proficiency in English is such that I am
6 able to review this English declaration, and I can affirm it is identical in substance
7 to my Spanish declaration. Only minor grammatical changes have been made.

8 2. I have been a journalist for over 8 years. I have worked for multiple
9 outfits. On June 14th I was on assignment in downtown Los Angeles for Zuma
10 Press. Zuma Press is a San Clemente based independent press agency and wire
11 service. I brought two professional cameras with me, a Nikkon camera and a Fuji
12 camera. I had a large camera bag. I had a large black and yellow press badge
13 issued by Zuma attached to a lanyard around my neck. My press credential was
14 easily visible. I also had a second press credential on my person as well as
15 business cards.

16 3. I arrived on scene to get photos of the No Kings Day protests. I was
17 filming families and protestors and families without incident until about 2:30
18 when LAPD presence became more noticeable and more aggressive.

19 4. From 4 pm until about 5 pm I was filming in front of the federal
20 building. Around that time, I decided that it was time to return back to my hotel.
21 By 5 pm I was close to 300 Los Angeles Street. I saw that LAPD officers had
22 formed a skirmish line and quickly started heading southbound in my direction.

23 5. I could see that there were LAPD officers on horses with batons,
24 LAPD officers with green and black less lethal rifles, and LAPD officers on foot
25 with shorter batons. About five minutes after arriving at my position Officers
26 started to use force against protestors.

27 6. I could not see any provocation from the protestors. The officers did
28 not appear to be at risk of serious bodily harm, nor did they seem to be defending

1 anyone else. People had their hands up. Nevertheless, LAPD officers began firing
2 their less lethals in blanket pattern at targets I can only describe as randomly
3 selected—to the extent they were selected at all.

4 7. As this happened, I was very close to the police line. I still had my
5 press pass, my camera bag, and my two cameras. I was taking photos of the
6 police line looking in the viewfinder of my camera when I saw an officer with a
7 less lethal aiming in my direction. I was very close to this officer, so given my
8 press pass and all the rest I don't think the officer could have not known I was a
9 member of the press. I was only taking photos which could not have possibly
10 been a threat to the officer. And I was so close to the officer that aiming and
11 firing at me could not have been an accident or a result of misaiming the
12 weapon.¹

13 8. I took a picture right as the officer fired at me. Though it happened
14 very quickly the less lethal munition hit my left knee first and then the munition
15 must have ricocheted off of my left knee and hit my right knee because both
16 knees got injured. I immediately felt pain in both knees and my left knee very
17 quickly started to bleed. The amount of blood was significant, and I was worried
18 because all I could see was an open wound.

19 9. I got away from the front line as quickly as I could. I got about 50
20 meters away from that location someone helped me clean the wound. Pretty soon
21 after that my knee started to swell.

22 10. The police were still blocking off my point of exit, and many other
23 parts of downtown. I didn't have a car and there was no easy way to get back to
24 the hotel where I was staying. I also knew that my knee would lock up if I
25 immediately got off of so I remained downtown for a little bit past the incident.
26 However, eventually I was able to make it back to my hotel.

27 11. I went to see a doctor where I was given antibiotics, my wound was
28 cleaned, my knee was drained, and I was given analgesics for my pain. I now

1. Exhibit 010 is a photo taken shortly after I was shot that is an accurate image of my
injury and the press pass I was wearing at the time. Exhibit 013 is a photo I took of
the officer that shot me, just before he shot me. He was approximately the same
distance when he shot me as he was when I took this photo.

1 have to wear a knee brace, I also need a walking cane. I have been told by a
2 doctor that I may need surgery. I am still in pain every day.

3
4 I declare under penalty of perjury under the laws of the United States of America
5 that the foregoing is true and correct. Executed this ____ day of June, at

6
7 _____ . _____
8 Héctor Adolfo Quintanar Perez
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2 doctor that I may need surgery. I am still in pain every day.

3
4 I declare under penalty of perjury under the laws of the United States of America
5 that the foregoing is true and correct. Executed this 27 day of June, at

6 Mexico City

Hector Adolfo Quintanar

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8 Héctor Adolfo Quintanar Perez
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